

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

PRESIDENT DONALD J. TRUMP,
an individual, and REPRESENTATIVE
RONNY JACKSON, an individual

Plaintiffs,

v.

PARAMOUNT GLOBAL d/b/a
PARAMOUNT, a Delaware
corporation, CBS BROADCASTING
INC., a New York corporation, and CBS
INTERACTIVE, INC., a Delaware
corporation,

Defendants.

Case 2:24-CV-00236-Z

**CONSENT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTIONS TO DISMISS AND CONSENT MOTION FOR AN
EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO COMPEL**

Defendants Paramount Global d/b/a Paramount, CBS Broadcasting Inc. and CBS Interactive Inc., (together "Defendants") have filed (1) a "Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue or, In the Alternative, to Transfer" (Dkt. 49), and (2) a "Motion to Dismiss the Complaint for Lack of Subject Matter, Jurisdiction and Failure to State a Claim" (Dkt. 51) (the "Motions").

The Parties jointly and respectfully request that the Court extend until **May 28, 2025** Plaintiffs' deadline to file an opposition to the Motions and, if such extension is granted, extend until **June 23, 2025** Defendants' deadline to file any reply papers.

The Parties further respectfully request that (i) Defendants' Motion to Compel the Production of Documents by Plaintiffs (Dkt. 57) be held in abeyance or, in the alternative, that the Court extend until **June 16, 2025** Plaintiffs' deadline to oppose that motion to compel; and (ii) that Plaintiffs time to file any Motion to Compel the Production of Documents by Defendants be extended until **June 30, 2025** and, should a Motion to Compel be filed, Defendants shall file a response to the motion by **July 23, 2025**. In the interim, the Parties will continue to meet and confer to try to narrow the scope of any issues.

Plaintiffs' counsel has conferred with counsel for Defendants, and all Parties have consented to this motion in writing.

Respectfully submitted,

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*Counsel for Plaintiffs, President Donald J. Trump
and Representative Ronny Jackson*

CERTIFICATE OF CONFERENCE

I certify that on the 15th day of April, 2025 I conferred with attorney Elizabeth McNamara, counsel for Defendants. Ms. McNamara stated that she is in agreement with this Motion.

/s/ Edward Andrew Paltzik

Edward Andrew Paltzik

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served pursuant to the Federal Rules of Civil Procedure on the 17th day of April, 2025, via the Northern District of Texas's electronic filing notification system.

/s/ Chris D. Parker

Chris D. Parker